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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TARGET CONSTRUCTION, INC.,

Plaintiff,

vs.

TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA, EDWARD
JAMES WHEELER, DANIEL HUNT and
DOES 1-10,

Defendants.

CASE NO. 2:14-cv-01004-JCM-VCF

**TRAVELERS PROPERTY
CASUALTY COMPANY OF
AMERICA'S MOTION FOR
SETTLEMENT CONFERENCE**

Pursuant to Local Rule 16-5, Defendant Travelers Property Casualty Company of America ("Travelers") hereby asks this Court to schedule a settlement conference to assist the parties in settling this case. Local Rule 16-5 provides that the Court may exercise its discretion at any time and set an appropriate civil case for settlement conference:

The court may, in its discretion and at any time, set any appropriate civil case for settlement conference, summary jury trial, or other alternative method of dispute resolution.

"Courts have long recognized, public policy strongly encourages settlement outside of litigation." *Ramparts, Inc. v. Weldon*, 2:10-cv-01665-GMN, 2011 WL 4527383 D. Nev. Sept. 28, 2011) (unpublished) (citing *Ahern v. Cent. Pac. Freight Lines*, 846 F.2d 47, 48 (9th Cir. 1988)). As explained by the *Ahern* court:

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The Ninth Circuit is firmly “committed to the rule that the law favors and encourages compromise settlements.” *United States v. McInnes*, 556 F.2d 436, 441 (9th Cir. 1977). “[T]here is an overriding public interest in settling and quieting litigation.” *Id.* (citations omitted). “It is well recognized that settlement agreements are judicially favored as a matter of sound public policy. Settlement agreements conserve judicial time and limit expensive litigation.” *Speed Shore Corp. v. Denda*, 605 F.2d 469, 473 (9th Cir. 1979).

Ahern, 846 F.2d at 48. Consistent with Local Rule 16-5 and public policy favoring settlement outside of litigation, Travelers hereby requests a settlement conference to explore whether this case can be compromised without the need of costly discovery or further Court intervention. Additionally, such a settlement conference could help the parties secure a just, speedy and inexpensive determination of this litigation consistent with Federal Rule of Civil Procedure 1.

Dated: September 23, 2014

SNELL & WILMER L.L.P.

By: /s/ Justin S. Hepworth

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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA'S MOTION FOR SETTLEMENT CONFERENCE** by the method indicated:

_____	U.S. Mail
_____	U.S. Certified Mail
_____	Facsimile Transmission
_____	Overnight Mail
_____	Federal Express
_____	Hand Delivery
<u> X </u>	Electronic Filing

and addressed to the following:

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DATED September 23, 2014

/s/ Maricris Williams
 An Employee of Snell & Wilmer L.L.P.